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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMERICAN NATIONAL PROPERTY AND
CASUALTY COMPANY,

Plaintiff,

vs.

SHAUN MICHAEL CALEY, an individual;
P.E.P. as Parent and Guardian ad Litem of
JANE DOE, a minor; DOES I through X;
ROES I through X;

Defendants.

Case No.: 2:24-cv-01723-JAD-BNW

**STIPULATION AND ORDER
EXTENDING TIME TO SUBMIT
DISCOVERY PLAN AND
SCHEDULING ORDER
(Third Request)**

Plaintiff AMERICAN NATIONAL PROPERTY AND CASUALTY COMPANY
("ANPAC"), Defendant SHAUN MICHAEL CALEY, ("Caley"), and P.E.P. as Parent and
Guardian ad Litem of JANE DOE ("P.E.P.") (collectively referred to as the "Parties"), by and
through their respective undersigned counsel of record, hereby stipulate and agree to extend the
date for submission of the Parties' Discovery Plan and Scheduling Order ("DPSO") for an
additional thirty (30) days, to April 16th, 2025.

On December 17, 2024, the parties agreed to extend the deadline date to submit a
stipulated DPSO for thirty days, from December 17, 2024, to January 16, 2025, based on a

1 settlement reached between the parties (ECF. No. 19). This Court signed the Order granting the
2 extension (ECF No. 20). This Court also denied as moot, and without prejudice, the pending
3 Motion to Dismiss and Motion to Stay (ECF Nos. 12 and 13), and allowed the parties to refile
4 their Motions, if necessary, by January 26, 2025 (ECF No. 20).

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6 On January 10, 2025, the parties Stipulated to a second request for extension of the
7 deadline to submit a DPSO to March 17, 2025. This was to complete a minor's compromise in
8 the underlying State case and included a request to extend the time for the parties to refile
9 Motion to Dismiss and Motion to Stay (ECF No. 21). On January 13, 2025, this Court entered
10 the Order, extending the deadline to submit a DPSO to March 17, 2025 and extending the
11 deadline to refile the Motion to Dismiss and Motion to Stay until March 27, 2025 (ECF No. 22).

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13 The parties need additional time to complete the settlement and dismiss the underlying
14 State Case. The minor's compromise has been completed, but a transfer of the funds is still
15 pending.

16 The Parties have therefore agreed to extend the time for submission of the DPSO for
17 thirty (30) days, to April 16th, 2025, or to file a Stipulation to Dismiss prior to that date. In
18 addition, the Parties agree to extend the date to refile the Motion to Dismiss and/or Motion to
19 Stay by thirty (30) days, to April 26, 2025.

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1 This is the Parties' Third Request for Extension of the deadline to submit a stipulated
2 DPSO.

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4 DATED this 17th day of March, 2025.

5 **PYATT SILVESTRI**

6 */s/ Richard Waltjen*

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16 Attorney for Plaintiff,

17 *American National Property And Casualty*

18 *Company*

19 DATED this 17th day of March, 2025.

20 **WHITMIRE LAW, PLLC**

21 */s/ James E. Whitmire*

22 James E. Whitmire, Esq.

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25 Las Vegas NV 89135

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28 *Attorney for P.E.P. as parent and Guardian Ad*

Litem of JANE DOE

DATED this 17th day of March, 2025.

DRUMMOND LAW FIRM

/s/ Craig W. Drummond

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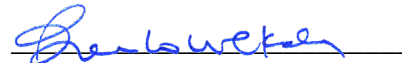
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Attorney for P.E.P. as parent and Guardian Ad

Litem of JANE DOE

IT IS SO ORDERED:



UNITED STATES DISTRICT
JUDGE/UNITED STATES MAGISTRATE
JUDGE

DATED: 3/19/2025